

**Davidson, Scott**

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**From:** Davidson, Scott  
**Sent:** Tuesday, July 22, 2014 8:36 AM  
**To:** 'Gary Peller'; Rodriguez, David John; eweissfelner@brownrudnick.com; hsteel@brownrudnick.com; einseibuch@capdale.com; plockwood@capdale.com; jliesemer@capdale.com; asackett@capdale.com; esserman@sbep-law.com; schmidt@whafh.com; brown@whafh.com; jflaxer@golenbock.com; MJWilliams@gibsondunn.com; KMartorana@gibsondunn.com; dgolden@akingump.com; Daniel@taloslaw.com  
**Cc:** Steinberg, Arthur; Ritacco, Gary; Amy Robertson(fwd)  
**Subject:** RE: In re Motors Liquidation Company, et al., Case No. 09-50026 (REG)

Mr. Peller:

Thank you for your email. New GM's response filed yesterday responds to the pleading filed by the Elliott Plaintiffs in the Bankruptcy Court on July 11, 2014. As stated in the response, New GM requested that it be given an opportunity to file supplemental papers if the Bankruptcy Court believes that a more substantive response is required at this time.

Thank you

**Scott I. Davidson | King & Spalding LLP**

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**From:** Gary Peller [<mailto:peller@law.georgetown.edu>]  
**Sent:** Monday, July 21, 2014 6:58 PM  
**To:** Rodriguez, David John; eweissfelner@brownrudnick.com; hsteel@brownrudnick.com; einseibuch@capdale.com; plockwood@capdale.com; jliesemer@capdale.com; asackett@capdale.com; esserman@sbep-law.com; schmidt@whafh.com; brown@whafh.com; jflaxer@golenbock.com; MJWilliams@gibsondunn.com; KMartorana@gibsondunn.com; dgolden@akingump.com; Daniel@taloslaw.com  
**Cc:** Steinberg, Arthur; Davidson, Scott; Ritacco, Gary; Amy Robertson(fwd)  
**Subject:** RE: In re Motors Liquidation Company, et al., Case No. 09-50026 (REG)

GM Counsel:

Thank you for this courtesy.

Does GM intend this also to constitute its response to the Elliotts' pending motion to dismiss for lack of subject matter jurisdiction, or does GM intend to submit separate papers in response to the motion? We are in the midst of preparing our papers for the JPML and would like to advise that tribunal whether GM is contesting jurisdiction to any extent beyond the authority cited here.

Thank you for a prompt reply.

Gary Peller, counsel for Plaintiffs in Elliott v. GM.

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**From:** Rodriguez, David John [[drodriguez@kslaw.com](mailto:drodriguez@kslaw.com)]  
**Sent:** Monday, July 21, 2014 5:14 PM  
**To:** eweissfelner@brownrudnick.com; hsteel@brownrudnick.com; einseibuch@capdale.com; plockwood@capdale.com; jliesemer@capdale.com; asackett@capdale.com; esserman@sbep-law.com;

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**Cc:** Steinberg, Arthur; Davidson, Scott; Ritacco, Gary; Rodriguez, David John  
**Subject:** In re Motors Liquidation Company, et al., Case No. 09-50026 (REG)

In connection with the above-referenced matter, attached please find a zip file with PDF service copies of:

*Response by General Motors LLC to No Stay Pleading Filed by the Elliott Plaintiffs (with Exhibits).*

Regards,  
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